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ROCKY FLATS MONITORING COMMITTE 4100-14h 5hor 2002 - السيام ما مد مد THEBRONE T 309 P 823-5872

ate Capitol Denver. Colorado 80203 elephone (303) 839-2565

May 15, 1978

Mr. W. H. Pennington, Director 4241 Office of MEPA Coordination 1.3: Department of Energy Mail Station E-201 Jashington, D.C. 20545

Dear Mr. Pennington:

This letter is in response to the Federal Register Notice regarding the Public Hearing on the Draft Environmental Impact Statement for the Rocky Flats Plant site at Golden. Colorado.

In accord with that Notice. the Rocky Flats Monitoring Committee wishes to become a "full participant" in the May 24, 1978, hearing with the provision of a statement by myself. John P. Elliott. Jr., Chairman of the Rocky Flats Monitoring Committee or my designee.

My presentation will address the following topics:

General comments on self-serving nature of DEIS.

Epidemiological studies: increaible slowness, need for priority support, insufficient evidence for categorical statements.

Cumulative effects of low-level radiation need to be addressed.

- Effect on adjacent land-use: litigation situation at least needs to be acknowledged.
- Inadequacy of maximum credible accident definition and need to acknowledge terrorism potentials.
- Age of information to be included in the final EIS data deadline. operation at present site.

Comments on the Radiological Emergency Response Plan. 8.

- Comments on plutonium soil standards and sampling methods: need to acknowledge scientific controversy. Better public relations.
- The final EIS may be a "final" statement but the impacts are not final: need to continue to analyze impacts.
- 11. Need to address non-radioactive, toxic material hazard and appropriate emergency response.

Mr. W. H. Pennington May 15, 1978 Page two.

My presentation will take approximately 20 - 30 minutes.

Yours very truly,

John P. Elliott, Jr., Chairman Rocky Flats Monitoring Committee

The Honorable Richard D. Lamm
The Honorable Timothy E. Wirth
Rocky Flats Monitoring Committee Members

TO: Mr. W. H. Pennington, Director, Office of NEPA Coordination Information to Qualify as "Full Participant" in May 24 DOE Hearing on Rocky Flats.

- (1) Dwight Filley 2729 Champa St. Denver. CO. 80205
- (2) Member of the Board, Colorado Open Space Council
- (3) Summary of comments:
  - General comments on plant location.

2. Prohibited airspace desired.

3. Moratorium on expansion of radioactive material operations.

4. Increased perimeter patrols.

Adequacy and testing of Emergency Response Plan.

Adequacy of terrorism discussion and maximum credible accident.
 Low-level radiation hazard.

8. Decision delineation.

9. DOE liability for contamination.

- 10. Air transportation of radioactive materials.
- (4) None
- (5) 20 minutes.